

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Joann Ferrer :
Debtor : BANKRUPTCY NO.: 17-10306-JFK

**STIPULATION TO RESOLVE
PATRICK FUNG'S MOTION FOR RELIEF**

In lieu of further litigation, the parties to this matter stipulate as follows:

1. By agreement of the parties, the automatic stay shall not apply to the Patrick Fung's (the "Landlord") ability to recover possession of the premises located at 4538 Cottman Avenue, Philadelphia, PA 19135 (the "Premises").
2. Debtor, Joann Ferrer, and all occupants shall have until May 7, 2017, to vacate the Premises.
3. The Landlord may immediately file a Landlord and Tenant Complaint and Obtain a Judgment for Possession ONLY of the Premises. However, no physical lockout may occur until after May 7, 2017.
4. The Debtor agrees not to contest Landlord's right to possession, and the Debtor agrees not to appeal any judgment for possession.
5. Debtor will provide access to the Premises to the Landlord and/or Landlord's agents provided 24 hours advanced Notice is given.
6. The Automatic Stay shall remain in effect as it pertains to any Judgments for money damages or rents owed prior to May 7, 2017.
7. The foregoing is the complete and final agreement of the parties.

Agreed and Accepted:

Howard J. Ford
Howard Ford, Esquire
Attorney for Landlord

/s/ Brandon Perloff
Brandon Perloff, Esquire
Attorney for Debtor